

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

CYNTHIA KITCHENS,)	C.A. # 2:16-CV-03723-RMG-MGB
)	
Plaintiff,)	
)	
v.)	
)	
THE BOEING COMPANY,)	
)	
Defendant.)	
)	

AFFIDAVIT OF THE PLAINTIFF

That I, Cynthia Kitchens, the Plaintiff do hereby swear to the following:

1. That I am the Plaintiff in the above referenced action.
2. That I have extensive experience and training in the aircraft industry.
3. My educational background includes Technology National Aviation Academy, Specialized Associates of Science Aviation Maintenance, and FAA Accountable Manager for 145 Repair Station.
4. I have held my Airframe License since September 2000 and my Powerplant License since September 2000. I currently hold an FCC Element 1 and an FAA Inspection Authorization which I received in March 2006.
5. I also hold FAA Technical Personnel Examiner DME-2007, Manager/Supervisor Training December-2006/Boeing Manager Training-2010, Boeing Inside Out Training 2015(Executive Leadership Program 2014), Executive Leadership Coaching 2015 and Lycoming Engine Service Factory School January of 2007.
6. I was hired at the North Charleston, South Carolina facility by Boeing as a Product Quality Manager K on June 18, 2010. When I was hired I was credited with previous service back to November of 2009.
7. My position with Boeing reclassified in May of 2011 to a Quality Multi-Family Manager K position.
8. I held that position up and until I resigned my employment on June 30, 2016.
9. During my employment I was assigned to the 787 BSC-Mid Assembly Quality Department at Boeing's North Charleston Facility.
10. In 2011, I made an ethics complaint was made against Elton Wright. I addressed several issues with Wright and his aggressive behavior toward employees and others. Wright informed me that it was a good old boy system and I needed to get on board. A week later Wright physically assaulted me. After my complaints Wright was promoted. This was called in by employee who seen Mr. Wright assault me. Ethic asked me, and I had sent letter to my Senior Steve at the time of the assault.
11. In 2012, I received a 24 on her performance evaluation. I reported my supervisor for inappropriate remarks in the workplace. As a result of the report my Supervisor reduced my evaluation to a 12 on the next Performance Review. When I protested the reduction, I was informed by my supervisor that she did not

- give a shit what I had to say.
12. The following year I was diagnosed with cancer. I underwent extensive treatment and was out of work. Prior to going out of work I had a 19 on my evaluation. While I was out of work receiving treatment, my supervisor reduced my evaluation to a 14. I was never told that my score was being lowered. As a result of them reducing my score I was removed from the leadership program that I was enrolled in. My supervisor further forged my signature on my evaluation as if they had reviewed it with me.
 13. As a result of the lowering of my score I went to ADR. During the ADR process the score was to put back to a 19. However, management refused. I finally agreed to a 17 to get back in the Leadership program.
 14. As a result of my complaints, my next PM was a 15. I knew it was in retaliation for protesting the lowering of my previous score and the forging of my signature on the evaluation.
 15. In 2014 I received a \$900.00 raise compared to her male counterpart receiving a \$2,900.00 raise. I am aware of the difference in raises because the male counterpart told me what his raise was. The male counterpart was out on medical leave for a heart condition but still received a higher raise than me.
 16. As a result of the issues with my evaluation, I sought assistance from an executive leadership coach with the Defendant.
 17. In April 2015, I applied for and was not selected for a supplier Quality position. A male counterpart was selected.
 18. In April 2015, I was curious as to why I had not been promoted after applying for several promotions. I spoke to Mike Tidmore who was a senior manager on 2nd shift. Mr. Tidmore informed me that it was because of my chemo fog or my age.
 19. During the same month I sent a letter to the head of North Charleston facility and complained about the problems and issues.
 20. In July 2015, I applied for and was not selected for a Quality Manager L position and was not selected. A male counterpart was selected.
 21. In August 2015, I was not selected for a Flight Line and Quality Assurance Position. A male candidate was selected for the position. I was qualified for the position.
 22. During the year 2015, I applied for 14 different positions. That I was not selected for any of the positions. I was qualified for all of the positions applied for.
 23. I filed my first charge of discrimination with EEOC on January 21, 2016.
 24. That I was supervised by Rocky Haskell and was doing very well.
 25. That when my performance was commended by Rocky Haskell I was transferred to Ron Pentz.
 26. Mr. Pentz had a reputation for discriminating against older individuals. There were several individuals within the plant that felt threatened by Mr. Pentz.
 27. I was transferred to his team not long after he had terminated a friend who had also filed a charge of discrimination for age discrimination, Bill Hobek.
 28. When I was transferred to Pentz I was told that they Pentz was going to do what they did to Mr. Hobek.
 29. Almost immediately after being transferred to Mr. Pentz's team I was threatened with unwarranted discipline.
 30. Pentz stated that he was going to place me on PIP. I informed my leadership coach; Jennifer and she told me that the PIP was a legal document used by Boeing to give proof to terminate an employee.
 31. That I reported Mr. Pentz's behavior to human resources and to Boeing's internal EEO. During the complaint process I requested a transfer to be away from the harassment. That Boeing refused and made the decision to leave me in the harassing environment. As a result, of the harassing environment I resigned.

32. That during my employment I was treated differently than my male counterparts who were allowed to take two days off during the week to cover the weekend, but I was only allowed to take off 1 day. My male counterparts received larger bonus checks in 2014 I saw Gordon's and he received a 2,900 bonus to my 900 bonus.
33. During my employment I wanted to go and work on the flight line. I was told by Steve Parrinello that I needed to be careful what I wished for because I most likely would have a hard time with the heat and the walking. It was insinuated to me that I would not receive the job because of my age.
34. During my employment as a supervisor I was informed that if I wanted to discipline anyone I had to run it past all senior management because of the ADR process. I was instructed to discipline individual's employees by upper management. I refused. That in particular I was instructed to discipline a particular employee because they had found several safety issues with an airplane. I refused. HR Leprincess called me at home after I worked all night on a Holiday weekend to say were as in HR and the Director of Quality was not happy with what you did with ADR and raising an employee score. Leprincess said that Mr. Castleberry is very upset at you and you need to call him right away. I called him right away before I went to sleep. Mr. Keith Castleberry was not upset with me he believes that I did ok. He even asked why I was calling him? I said HR Leprincess told me to call you right away.
35. I realized that during my employment they were using corrective actions to get rid of people. I refused to be part of it.
36. In one instance I had a good employee, Autry Comer. Mr. Comer had a fall at work and was hurt. Mr. Comer made a big deal of the bad floorboards causing his injury. Mr. Comer's complaints upset management. As a result of the complaints, Steve Parrinello informed me that I needed to make Autry be quiet. I refused. Parrinello then instructed Gordon to do it.
37. That during my employment, I did not receive any complaints about my performance. Mr. Pentz stated that he could not remember any but believe that there were some complaints to HR. No one made any complaints about me because I was helping them keep their jobs.
38. Pentz claims that I had issues with understanding the scope of work. However, I worked in all departments before I worked in wiring for the building on first shift and my understanding of the scope of work had improved. However, I was moved to another area. I have a certificate to show that I understood the entire scope of work.
39. Unfortunately, in dealing with Mr. Pentz I learned that he did not know the technical terms of the aircraft on occasion. In particular, Ron asked me to give him the measurements for the hole in the side of the aircraft. I said what hole. Pentz response was the big one. I called Steve to find out if he was kidding. I said I took him to the aircraft he still could not show me what hole in the aircraft. Steve gave Pentz a drawing to bring me. Pentz was actually looking for the answer for Supplier Quality and he did not know the answer. Steve told me to give him a break and help him.
40. Mr. Pentz addressed the conflicts that I may have had with other employees, particularly Tracy Darnell. It was brought to HR's attention that Darnell was stealing time from Boeing. I was not aware of this investigation and when I was asked by the other senior manager in the office with Ron Mr. Kelly if Darnell was in the building at 3:00 am. I informed Mr. Kelly that I did not see her because I was talking to an employee. As a result, a complaint was made that there was a conflict with me. Darnell was removed from Temp manager position when I resigned. Then She resigned her employment not long after I resigned my employment.
41. Pentz contends that he met with me three or four times for formal meetings. However, one of those alleged formal meetings he informed me that he wanted to meet me at 6am. I waited for him-he was 30 minutes late. Pentz walked in the room said how was last night. I informed him that it was ok. Ron said ok you can go now. Pentz was stressing me out. I had already gone to HR and informed them that I could not be under stress.

42. I was out of work for two weeks due to stress and saw a cardiologist for chest pain due to the stress being caused by Pentz. As a result of the stress I decided to resign my employment.
43. Parrinello contends that my team had the lowest number of quality buyoffs during my shift. However, I had the lowest number of employees on my shift.
44. I gave Parrinello feedback on several areas. Parrinello refused to utilize the information that I provided from my leadership coach, senior manager information of manufacturing.
45. During my employment I wrote up FOD. First level management would call Parrinello at home and tell him that I was writing up dust. I turned the FOD into the FAA. I reported the incidents because I have an aviation license and did not want it to be in danger for not reporting the FOD.
46. Parrinello further states that my shift failed to do the proper turnovers and he would have to do research to find out if there were things that were completed, or they weren't completed. This is a blatant misrepresentation of fact. Parrinello always received a turn over from my lead. IT was mandatory at the end of every shift. Each shift informed the next shift what was not completed.
47. I performed well under Rocky Haskell. If I had stayed with Rocky I would not have been under the stress I was under with Ron Pentz and his discriminatory treatment. If I had stayed with Rocky I would have remained employed with Boeing and not been forced to resign to save my health.
48. At no time during the time that I was last supervised by Parrinello contrary to is testimony he never counseled me regarding my performance. If there was a problem, he would have counseled me. Mr. Parrinello never told me he was going to give me a Performance Improvement Plan. At no time did he warn me about my performance. Mr. Parrinello's representation that he did is a blatant lie. He went on to say that because he was transferred he could not give the PIP he was going to give. That the next manager Ron had to give it to me? The next manager after Steve was Rocky not Ron?
49. During my employment I was told to tell my employees that 15 or 16 were not bad scores for managers or employees. All Manager K level are told 15 or 16 not bad scores. However, the attorney for Boeing has informed the Court that 15 and 16 were bad scores for an evaluation.
50. Addressing my evaluations:
- a. 2014
 - i. Leadership Attributes-I had 5 employees on my shift. First shift had 60 employees and 2nd shift had 30. I only had 5. Therefore, my shift suffered for lack of employees.
 - ii. Unfortunately, my team of 5 had the same scope of work as the other shifts with less people to perform the work. Boeing failed to consider that when evaluating my teams and my own performance. They were comparing Apples to Oranges by shift.
 - b. 04/01/2014-12/23/14
 - i. Delivery/customer satisfaction
 - 1. Comments: I have an aviation license. I understood the scope of work. Manufacturing did not like that I made them fix things before my inspectors would buy it off. Day shift would buy off items and my shift would have to fix them. The safety of the aircraft and my employees was the most important thing to me. I would not allow Boeing management to get away with failing in regard to the safety of the aircraft. This is the First line Quality Managers job to ensure the employee's and the aircraft was safe.
 - ii. World-Class Support
 - 1. I walked the floor my employees always working. After they could not find things on me they would get after my

employees. I had the employees go to ADR because I could not help them because of the harassment I was going through. I had a total of 15 ADR cases. It was the only way to help the employees. I felt really bad that my employees were starting to have problems because Boeing was trying to get rid of me.

C. 2015

- i. I would not allow my employees to buy off items that were not correct. I reported them to the FAA. I would make my employees to fix all problems I would not allow them to pass it off to another shift

d. 2015

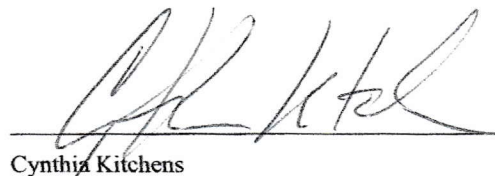
- i. In my evaluation it states that I need to stay on top of my team. However, I was the one that found the calibrated tools and reported them. Day shift had failed to do their job. I was the one that reported it and then was informed it was my fault in my evaluation.
- ii. In my evaluations it states that I need to find solutions. I had solutions to fix nonconformance, so it could be bought off. They refused to allow me and my team to do so. They would wait till the next shift and it would be bought off incorrectly.

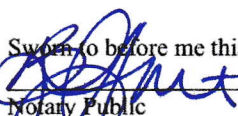
51. During my employment I did not have the backing of senior management because of the agenda to get rid of me. Management went out of their way to set me up to fail and then lied about it in the depositions. Mr. Parrinello never informed me that there was a problem with my performance. Haskell commended my performance. When I reached Mr. Pentz team it was determined that I needed to be gone because of my complaints and my age.
52. I understand the build. I am a licensed mechanic with the FAA. Mr. Pentz failed to even know the proper terms when addressing the airplane.
53. When I was on one shift all of my employees were green on certifications. When I was moved to third shift one employee was 15 certifications behind.
54. Attached to the Defendant's motion is notes from Mr. Pentz. On 6/9/2016 I had asked Pentz if we were done. He said yes. I needed to leave because of health issues due to complications from the rectal cancer. Ron gets delight from the stress. He laughed at me when I passed gas.
55. In the Defendant's introduction: I did go on vacation. I was stressed out and have problems with my ability to control my bowels because of stress at work. My doctors put me on leave for two weeks. I went on the cruise with my sister to decompress as suggested by my doctor. During that leave time I had started seeing a heart doctor because of the stress every day. Ron was tormenting me every day prior to my vacation and being out of work by my doctor. During my PM he laughed in my face when I said you're not going to put me on a PIP, so you can walk me out like you did Bill Hobek. His comment is that what you think? I said yes, he laughed he did not reassure me that it was in my best interest. It was as if he was getting enjoyment of how he was upsetting me. The PIP was causing medical issues. I was having chest pains when I resigned despite being on vacation and written out of work by my doctor. When I returned to work Ron started that night with a phone call to start the stress again. I was really afraid that I was going to have a heart attack from the stress that Pentz was causing me.
56. Once Boeing terminated Bill Hobek's employment I was in fell into the next age group to leave. Dallas Ratcliff was age above Bill and he left because of the discrimination accruing at the hands of management. Management had been after Dallas for several months. Unfortunately, we were all keeping our heads low trying to not be the next one walked out the door.
57. Parrinello specifically informed me that I would not make it on the flight line because of my age. Parrinello informed me that Phil Shaw was out and having a hard time with the heat and walking because of his age and they were doing me a favor by not giving me that job.

58. Prior to my cancer my PM's were higher in the 20's. After my cancer the scores were lower, and I believed that they were to get rid of me. The scores of 15 and 16 were false.
59. During my employment, my employees scored me the highest of any managers on Charleston Boeing Site. I was told by Jeff Joes who was E level management that he was impressed by my scores from the employees on my performance.
60. In the Defendant's memo, they address the Flight Line Operations Manager L position that I applied for. The first two spots on flight line was given to people that I knew. One man I went to FAA recertification for IA. He had same qualifications as I had all but one. I was the FAA Accountable Manager for a 145-Repair station he never was but, he was young man in his 40s and I was female 60. The other man Chris did not want the job because it was a different shift. We both had aviation licenses. I had IA inspector license. I ran the 145-repair station and was auditor for the Charleston airport 121 for the other company I work at Boxell located in Charleston SC. Chris was later fired when arrested for not paying taxes as 40 some other employees. Neil Wright was one of the higher up that put these two young men in the job to work while it was posted. They could have given me the job I was qualified. Then hired someone after it was posted. Neil Wright that pushed me around and said to get with the good old boys or I would go no place in this company.
61. In the defendant's memo they address the Tracy Darnell "conflict."
62. Tracy was put into temp manager spot. After I left in June she was taken out of the temp manager spot. Became an inspector again?
63. Tracy was part of the harassment. At one point when I was talking to her doing a face-to-face turn over. Tracy told me my cancer was not that bad? I had to get up and go back to my desk. I thought why did she say that? Then I had to tell myself I must look ok for what I had just went through. Tracy would yell and stand over me. My Lead was there one morning and said what is wrong with her. I would have to get up leave because of my cancer I had to go to the bathroom and clean myself. Go home change my clothes. I could not endure the stress then she would send email that I was not a team player. If they could see what was happening to me. Cancer was not good but, That I could take care of. What they kept doing to me. The stress I could not take every day. That is why I told HR I needed to be removed to another dept. The Senior knew that Tracy harassment was working. I was getting beat down and was having trouble recovering. They finally found a way to get me to leave. I had told Steve in a meeting Tracy was getting aggressive towards me. His comment takes her to get coffee and fix it. Fix what? I knew what they were doing, and I could not fix that. I was strong the disability was a different story. The bathroom issue was hard in its self. Without the added abuse of the seniors.
64. After I left my employment Tracy was no longer a temp manager.
65. The Defendant addresses the issue of my complaint in 2016 as unfounded. The raise was 600.00 the rest was a bonus. I believe the ethics called it a salary adjustment? For my job classification. I had received 900.00 and the other manager Gordan received 2,900.00 I worked his cell when he was out sick. Steve gave him 2,900. and I received 900. I asked the other managers if that was low they said something wrong. I asked Steve all the time why the other guys get so much more than me? His comment was you're not to be telling each other what your pay is. Gordon and I was saying about being out on sick leave you receive only meets on your PM. He showed me the paper with the score he had same score. but, he had 2,900. I had 900.00 and worked his department and mine when he was off.
66. Rocky Haskell informed me that I did not need a PIP. I called Rocky to see why Ron was going to be my manager. Why Rocky did not tell me Rocky said he had just found out. I was already called by Ron and told he would now be my manager.
67. Ron reviewed my paper work from leadership coach. Said I needed to cover the building on 3rd not just cell 10. I had been doing this for two months already. He said I will review this and get back to you. Never said What the issue was just he would get back to me later. Then he said he would have given me PIP two or three weeks later. I would have stress of being let go for another three weeks. Ron said I could have improved in that time. BUT, had no idea what improvements he was

68. My vacation was June 15th and Ron had the PM talk with me after the heart doctor leave on June 28th. That night before called me to say at 10:30 pm I will need to see you for 5 min in my office in the morning. No more than 5 min he kept saying. That day he had me wait in his office and came 30 min late. Then said what happen last night I said nothing Why? Ron said ok you can go. Cat and mouse game. I had just come back from leave that night. Had to stress all night about the 5-min meeting in the morning. He arrives late? He always calls if he is late no call? I waited 30 min because I thought he would write me up if I went home after working all night. Only to be told I could go home now. I went to my desk to send a letter to the Ethics in STL the highest level in Boeing. Told them what was going on and they needed to send someone to check out what was happening in Charleston site. I then went home shaking I had to sleep after working all night. The stress and what happen was not letting me sleep. It was the weekend Ron said I had to work. I called off sent him a text and email. Covered myself with everything I could use. I called off all weekend because of bathroom issues. I knew at that point I had to leave Boeing. Before my cancer came back from the stress. The heart pain was increasing, and bathroom issues had come to a point I no longer had control at all.

69. Hostile of being pushed around by Neil Wright through the years up to Neil putting Ron over me to walk me out. There was age for comments made by Steve about flight line and Mike Tidmore chemo fog or my age can't remember. Disability I asked HR and senior to remove me from the stress because of cancer and stress. Told No after I explained why? Pol-5 stated the HR and Senior are there to protect the employee. They are responsible to do so. ISO9001:2008/AS9100C is a certificate that Boeing holds, and they are not being non-compliant because of this issue. I believe the retaliation is because I turned Boeing into the FAA in Washington DC 2010 /2011 for unsafe aircraft. I believe I did not receive the flight line job because of the whistle blowing. If I could not see I could not report them.


Cynthia Kitchens

Sworn to before me this 9 day December 2017

Notary Public
My commission expires 7/17/22